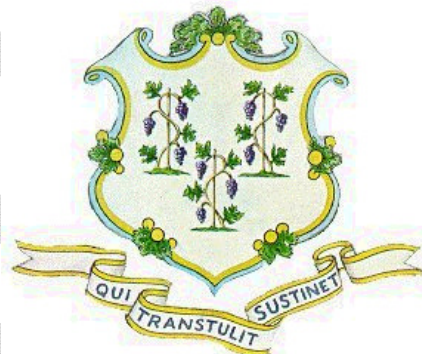




**State of Connecticut  
Recovery Housing Program (RHP)**

**Action Plan – Federal Fiscal Year 2020  
and Federal Fiscal Year 2021**



Submitted to the  
**U.S. Department of Housing and Urban Development**

by the  
State of Connecticut

**July 16, 2021**

# State of Connecticut Recovery Housing Program Action Plan for FFY 2020 and FFY 2021

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## **I. EXECUTIVE SUMMARY**

### **A. Overview**

This State of Connecticut Recovery Housing Program Action Plan for FFY 20 and FFY 21 is submitted to the U.S. Department of Housing and Urban Development (HUD) in order to be eligible to receive funding under the pilot Recovery Housing Program (RHP) authorized by the SUPPORT for Patients and Communities Act (SUPPORT Act), which was passed in 2018. RHP rules fall under the umbrella of the Community Development Block Grant (CDBG) Program, as modified for RHP by Federal Register Notice (FR-6225-N-01) (the Notice).

The intent of the pilot Recovery Housing Program (RHP) is to support individuals in recovery from substance use disorders (SUD) on a path to self-sufficiency by providing stable, temporary housing. RHP funds may be used to develop or maintain housing for individuals in recovery from SUD. Assistance for individuals is limited to the earlier of two years (cumulative) or until they secure permanent housing.

As mandated by the SUPPORT Act, The State of Connecticut will distribute funds giving priority to entities with the greatest need and ability to deliver effective assistance in a timely manner. RHP dollars will be utilized in the following two ways: 1) in conjunction with the state's two Continuum of Cares, the Connecticut Balance of State Continuum of Care (CT BOS CoC) and Opening Doors Fairfield County (ODFC) in support of creating sober housing; and 2) in conjunction with the Court Support Services Division of the State of Connecticut Judicial Branch in the creation of transitional housing.

The CT BOS CoC and ODFC are united coalitions of community and state systems that assist persons experiencing homelessness or are at risk of homelessness in Connecticut to obtain housing, economic stability, and an enhanced quality of life through a coordinated community-based process of identifying and addressing needs. Avoiding duplication of efforts, leveraging resources and coordinated planning are other purposes of the CT BOS and ODFC.

The following table details the funding allocated to the State of Connecticut under the pilot Recovery Housing Program (RHP) authorized by the SUPPORT for Patients and Communities Act (SUPPORT Act).

<b>Recovery Housing Program funds for the State of Connecticut</b>	
Allocation Year	Recovery Housing Program Funds
Federal Fiscal Year 2020	\$944,000
Federal Fiscal Year 2021	\$944,199

## **B. State Direct Administration**

The State of Connecticut will use its RHP funds to act directly, subject to state law and RHP requirements, to carry out activities through employees, contractors, and subrecipients in all geographic areas within its jurisdiction, including entitlement areas and tribal areas. The state will focus RHP funds towards projects that complement federal substance abuse-related assistance, and will be responsible for submitting the Request for Release of funds to HUD for approval.

The State of Connecticut will carry out activities through subrecipients and will comply with 24 CFR 570.489(m) relating to monitoring and management of subrecipients. The definition of subrecipient at 24 CFR 570.500(c) applies when utilizing subrecipients, and the requirements of 24 CFR 570.489(g) (as modified by section II.D.vii) shall apply. For purposes of this alternative requirement, the definition of subrecipients at CFR 570.500(c) is modified to expressly include Indian tribes. Indian tribes that receive RHP funding from the State of Connecticut must comply with the Indian Civil Rights Act (Title II of the Civil Rights Act of 1968, 25 U.S.C. 1301 et seq).

For activities carried out by the State of Connecticut in entitlement areas, the provisions of 24 CFR 570.486(c) are waived to the extent necessary to allow the state, either directly or through units of general local government, to use RHP funds for activities located in entitlement areas without contribution from the entitlement jurisdiction.

At its discretion, the State of Connecticut may carry out activities utilizing the state CDBG program regulations to distribute RHP funds to units of general local government, Indian tribes, tribally-designated housing entities, and entitlement areas.

### **C. Objectives and Outcomes**

The State of Connecticut will utilize RHP funding on RHP-eligible activities (42 U.S.C. 5305(a)). The state will utilize RHP funding for the purpose of providing stable, temporary housing for individuals in recovery from a substance use disorder.

CDBG-eligible activities that meet the RHP intent of providing stable, temporary housing for individuals in recovery from a substance use disorder are limited to:

- Public facilities and improvements;
- Acquisition of real property;
- Lease, rent, and utilities;
- Rehabilitation and reconstruction of single-unit residential buildings;
- Rehabilitation and reconstruction of multi-unit residential buildings;
- Rehabilitation and reconstruction of public housing;
- Disposition of real property;
- Clearance and demolition;
- Relocation; and
- Expansion of existing eligible activities to include new construction of housing.

RHP funds may not be used for activities to aid in the prevention or elimination of slums or blight, or activities addressing urgent needs. All RHP funds must be used for activities that benefit LMI[MA1] persons.

Lease, rent, and utilities costs may be paid for an eligible individual for up to 2 years. There is not limit on the portion of the grant that may be used for such costs. Payments must result in a new service or quantifiable increase in an existing service.

The state use of RHP funds is not required to be consistent with the consolidated plan and HUD is not required to annually review RHP program performance for consistency with the consolidated plan. The RHP Action Plan will be submitted separately from the consolidated

plan, and the RHP program don't not need to be referenced in the consolidated plan submitted in IDIS. The state will prepare a single Action Plan once per RHP allocation, not annually. Updating the current consolidated plan's needs assessment, market analysis, and strategy is not required.

#### **D. Citizen Participation**

In accordance Connecticut's Amended Citizen Participation Plan, DOH will solicit public input in order to: 1) solicit input into the development of the draft plan; and 2) solicit feedback and comments on the draft plan.

The DOH conducted several round table discussions with state officials, representatives of the Continuums of Care, the Connecticut Balance of State Continuum of Care (CT BOS CoC) and Opening Doors Fairfield County (ODFC), as well as other housing/service organizations to seek input into the development of the State of Connecticut Recovery Housing Program Action Plan for FFY 20 and FFY 21. A fifteen (15) day community input period will begin on Thursday, July 15, 2021 and end on Friday, July 30, 2021. The Department will conduct a virtual public meeting on Thursday, July 29, 2021 which will begin at 10:00 AM and end when all attendees have had the opportunity to provide input and comment. A legal notice for the public meeting will be published in four newspapers across the state including one in Spanish. The legal notice will also be posted on DOH's web site and forwarded to all 169 municipal chief elected officials as well as all public housing authorities and the councils of government. In addition, the legal notice will be sent via email to our Community Partners list, for further distribution, in accordance with DOH's Amended Citizen Participation Plan.

All comments received will be summarized and responded to in Attachment A of the State of Connecticut Recovery Housing Program Action Plan for FFY 20 and FFY 21.

## **II. INTRODUCTION**

The State of Connecticut's RHP funds will be utilized to support individuals in recovery onto a path to self-sufficiency. By providing stable housing to support recovery, the state's RHP funds will support efforts for independent living and will be used to develop or maintain housing for

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individuals in recovery from substance abuse disorder. Assistance for individuals is limited to the earlier of two years (cumulative) or until they secure permanent housing.

To maximize and leverage resources, the state will coordinate RHP-funded projects with the state's two Continuums of Care, the Connecticut Balance of State Continuum of Care (CT BOS CoC) and Opening Doors Fairfield County (ODFC); and will also coordinate RHP-funded projects with the Court Support Services Division of the State of Connecticut Judicial Branch.<sup>[HC2]</sup>

The activities and resources discussed in this Action Plan will be administered by the Department of Housing (DOH).

The Action Plan includes the following sections in accordance with federal regulations:

- Resources: Funding sources available;
- State Direct Activity;
- Method for distributing funds for activities;
- Geographic Distribution: Geographic areas to which the state will direct assistance;
- Administration Costs;
- Program Income;
- Monitoring;
- Procurement Process;
- Priority Needs;
- National Objectives;
- Eligible Activities;
- Overall Benefit;
- Waivers and Alternative Requirements
- Summary of Public Comments: Comments made on the Action Plan and DOH responses;
- Applications for Assistance: HUD Form SF-424;

### **III. CITIZEN PARTICIPATION**

In accordance Connecticut's Amended Citizen Participation Plan, DOH solicited public input in order to: 1) solicit input into the development of the draft Plan; and 2) solicit feedback and comments with on the draft plan.

The DOH conducted one virtual public meeting, and several round table discussions with State officials, representatives of the Continuums of Care, the Connecticut Balance of State Continuum of Care (CT BOS CoC) and Opening Doors Fairfield County (ODFC), as well as other housing/service organizations to seek input into the development of the State of Connecticut Recovery Housing Program Action Plan for FFY 20 and FFY 21. A fifteen (15) day community input period will begin on XXXXXday, July XX, 2021 and end on XXXday, July XX, 2021. The Department will conduct a virtual public meeting on XXXday, July XX, 2021 which will begin at 2:00 PM and end when all attendees had the opportunity to provide input and comment. A legal notice for the public meeting was published in four newspapers across the state including one in Spanish. The legal notice was also posted on DOH's web site and forwarded to all 169 municipal chief elected officials as well as all public housing authorities and the councils of government. In addition, the legal notice was sent via email to our Community Partners list, for further distribution, in accordance with DOH's Amended Citizen Participation Plan.

All comments received will be summarized and responded to in Attachment A of the State of Connecticut Recovery Housing Program Action Plan for FFY 20 and FFY 21.

DOH notified the chief elected officials of all 169 municipalities in the state and its community partners about the dates, times, and locations of the public hearing and of the timing of the commentary periods. The state's regional Councils of Government were forwarded a copy of the legal notices and asked to post them on their websites.

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#### **Outline of Activity for Public Hearings/Public Comment:**

Please see Attachment A-3 Summary of Public Comments Received and DOH Responses.

#### **A. Cross-Sector Partnerships**

The intent of RHP is to support individuals in recovery from substance use disorders (SUD) on a path to self-sufficiency by providing stable, temporary housing. Cross-sector



partnerships help serve the diverse needs that those entering recovery housing are likely to have and enhance the impact of recovery housing.

Recovery housing is one component of the care continuum that promotes long-term recovery and addresses the needs of the whole person with a SUD. Housing First/Whole Person Care addresses various dimensions of an individual's life that require different treatment that may affect long-term recovery. Partnerships that bring additional resources to collectively address all dimensions are essential. The State of Connecticut intends to coordinate with the state's two Continuum of Care, the Connecticut Balance of State Continuum of Care (CT BOS CoC) and Opening Doors Fairfield County (ODFC); and will also coordinate with the Court Support Services Division of the State of Connecticut Judicial Branch.<sup>[HC3]</sup>

## IV. FEDERAL REQUIREMENTS

### A. Resources

In accordance with Section 8071 of the SUPPORT for Patients and Communities Act, entitled Pilot Program to Help Individuals in Recovery From a Substance Use Disorder Become Stably Housed, herein referred to as the Recovery Housing Program (RHP), resources are being distributed in accordance with this State of Connecticut Recovery Housing Program Action Plan Federal Fiscal Year 2020 and Federal Fiscal Year 2021.

This Recovery Housing Program Action Plan provides a detailed plan for expending federal funds for FFY 2020 and FFY 2021:

Recovery Housing Program funds for the State of Connecticut	
Allocation Year	Recovery Housing Program Funds
Federal Fiscal Year 2020	\$944,000
Federal Fiscal Year 2021	\$944,199

The State of Connecticut will comply with RHP expenditure requirements and deadlines, including to expend at least 30% of its RHP funds within one year from the date HUD signs the RHP grant agreement, to expend 100% of the RHP funds before the end of the period of performance on September 1, 2027, and to limit administrative costs to 5% of the RHP grant. All program activities will be carried out directly through employees, procured contracts, or under agreements with subrecipients. RHP funds will be used in accordance with all program requirements including 2 CFR Part 200. All costs charged to the RHP grant must be reasonable and necessary.

While the state cannot anticipate what other public or private funds may become available to support the programs, activities and strategies discussed here, the state will endeavor to maximize the use of any such resources as they become available.

### B. Method of Distribution

The state's methods of distributing funds and carrying out activities funded by HUD will be through a Notice of Funding Availability (NOFA) and a competitive application process. The state will distribute RHP funds with priority given to entities serving populations with the

greatest need and the ability to complete the eligible activity in a timely manner. RHP funds will be administered through the Department of Housing in collaboration with the state's two Continuum of Care, the Connecticut Balance of State Continuum of Care (CT BOS CoC) and Opening Doors Fairfield County (ODFC); and also in collaboration with the Court Support Services Division of the State of Connecticut Judicial Branch. To maximize and leverage these resources, the state will coordinate RHP-funded projects with other Federal and non-federal assistance related to substance abuse, homelessness and at-risk of homelessness, employment, and other wrap-around services.

### **C. National Objective and Eligible Activities**

The State of Connecticut will utilize RHP funding on RHP-eligible activities (42 U.S.C. 5305(a)). The state will utilize RHP funding for the purpose of providing stable, temporary housing for individuals in recovery from a substance use disorder.

CDBG-eligible activities that meet the RHP intent of providing stable, temporary housing for individuals in recovery from a substance use disorder are limited to:

- Public facilities and improvements;
- Acquisition of real property;
- Lease, rent, and utilities;
- Rehabilitation and reconstruction of single-unit residential buildings;
- Rehabilitation and reconstruction of multi-unit residential buildings;
- Rehabilitation and reconstruction of public housing;
- Disposition of real property;
- Clearance and demolition;
- Relocation; and
- Expansion of existing eligible activities to include new construction of housing.

RHP funds may not be used for activities to aid in the prevention or elimination of slums or blight, or activities addressing urgent needs. All RHP funds must be used for activities that benefit LMI persons. 24CFR 570.208(a)(2) and 570.483(b)(2)(i)(B) expand Limited Clientele criteria to enable assistance for acquisition, rehabilitation, reconstruction, or new construction activities, when at least 51% of beneficiaries are LMI. Any cost or other limitations on beneficiary participation may not be prohibitive for low-income persons. In

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addition, 24CFR 570.208(a)(2)(i)(A) or 570.483(b)(2)(ii)(A) expands eligible categories of Limited Clientele to include persons who meet the federal poverty limits or persons who are insured by Medicaid.

Lease, rent, and utilities costs may be paid for an eligible individual for up to 2 years. There is not limit on the portion of the grant that may be used for such costs. Payments must result in a new service or quantifiable increase in an existing service.

Grant administration will be capped at 5% of the allocation. The state does not intend to utilize RHP funds to generate program income or to allocate RHP funding for technical assistance. Administration matching funds are not required.

#### **D. Waivers and Alternative Requirements**

Section 8071 of the SUPPORT Act (Section 8071) requires funds appropriated or made available for the Recovery Housing Program be treated as community development block grant (CDBG) funds under Title I of the Housing and Community Development Act of 1974, unless otherwise provided in Section 8071 or modified by waivers and alternative requirements. The SUPPORT Act authorizes the Secretary to waive or specify alternative requirements to any provision of Title I of the HCD Act, except for requirements related to fair housing, nondiscrimination, labor standards, the environment, and requirements that activities benefit persons of low-and moderate-income. These waivers and alternative requirements are only applicable to the use of RHP funds and do not apply to CDBG funds used in conjunction with RHP funds or other sources of CDBG funds that are used for similar activities.

The State of Connecticut will follow all applicable waivers and alternative requirements to the CDBG program requirements at Title I of the Housing and Community Development Act (HCDA) and 24 CFR Part 570 that HUD has found are necessary to expedite or facilitate the use of RHP funds. Except as specified in the Notice, the statutory and regulatory provisions of the annual CDBG program apply.

## **E. Geographic Distribution**

The State of Connecticut will use its RHP funds to act directly, subject to state law and RHP requirements, to carry out activities through employees, contractors, and subrecipients in all geographic areas within its jurisdiction, including entitlement areas and tribal areas. The State of Connecticut will prioritize the distribution of funds in the service area of the Opening Doors Fairfield County (ODFC) Continuum of Care, service availability through Court Support Services Division of the State of Connecticut Judicial Branch in the creation of transitional housing<sup>[HC4]</sup>.

## **V. PROGRAM ACTIVITIES**

### **A. Recovery Housing Program (RHP)**

Federal Register Notice (FR-6225-N-01) (the Notice) implements the pilot Recovery Housing Program (RHP) authorized by the SUPPORT for Patients and Communities Act (SUPPORT Act), which was passed in 2018. The intent of RHP is to support individuals in recovery from substance use disorders (SUD) on a path to self-sufficiency by providing stable, temporary housing. RHP funds may be used to develop or maintain housing for individuals in recovery from SUD. Assistance for individuals is limited to the earlier of two years (cumulative) or until they secure permanent housing.

Section 8071 of the SUPPORT Act (Section 8071) requires funds appropriated or made available for the Recovery Housing Program be treated as community development block grant (CDBG) funds under Title I of the Housing and Community Development Act of 1974, unless otherwise provided in Section 8071 or modified by waivers and alternative requirements. The SUPPORT Act authorizes the Secretary to waive or specify alternative requirements to any provision of Title I of the HCD Act, except for requirements related to fair housing, nondiscrimination, labor standards, the environment, and requirements that activities benefit persons of low-and moderate-income. These waivers and alternative requirements are only applicable to the use of RHP funds and do not apply to CDBG funds used in conjunction with RHP funds or other sources of CDBG funds that are used for similar activities.

The RHP is administered by the United States Department of Housing and Urban Development (HUD). Within the State of Connecticut, the Department of Housing (DOH) is designated as the principal state agency for the allocation and administration of RHP funding.

#### **1. FY 2020 and FY 2021 Resource Allocation Plan for RHP**

This Recovery Housing Program Action Plan provides a detailed plan for expending federal funds for FFY 2020 and FFY 2021:

<b>Recovery Housing Program funds for the State of Connecticut</b>	
Allocation Year	Recovery Housing Program Funds
Federal Fiscal Year 2020	\$944,000
Federal Fiscal Year 2021	\$944,199

The State of Connecticut will comply with RHP expenditure requirements and deadlines, including to expend at least 30% of its RHP funds within one year from the date HUD signs the RHP grant agreement, to expend 100% of the RHP funds before the end of the period of performance on September 1, 2027, and to limit administrative costs to 5% of the RHP grant. All program activities will be carried out directly through employees, procured contracts, or under agreements with subrecipients. RHP funds will be used in accordance with all program requirements including 2 CFR Part 200. All costs charged to the RHP grant must be reasonable and necessary.

The Federal Fiscal Year 2020 allocation to DOH for the RHP Program is anticipated to be \$944,000 and the Federal Fiscal Year 2021 allocation is anticipated to be \$944,199. RHP funds are subject to availability from the federal government. If changes to this distribution become necessary, procedures outlined below will be observed in making those changes. Grant administration for FFY 20 will be capped at 5% of the allocation, which is \$47,200. Grant administration for FFY 21 will be capped at 5% of the allocation, which is \$47,210. Administration matching funds are not required. The state does not intend to utilize RHP funds to generate program income or to allocate RHP funding for technical assistance.

The total funds available to fund projects out of FFY 20, is anticipated to be \$896,800 which is FFY 20 allocation of \$944,000 minus administrative costs of \$47,200. The total funds available to fund projects out of FFY 21, is anticipated to be \$896,989 which is FFY 21 allocation of \$944,199 minus administrative costs of \$47,210.

As mandated by the SUPPORT Act, the State of Connecticut will distribute funds giving priority to entities with the greatest need and ability to deliver effective assistance in a timely manner. RHP dollars will be utilized in the following two ways: 1) in conjunction with the state's two Continuum of Care, the Connecticut Balance of State Continuum of Care (CT BOS CoC) and Opening Doors Fairfield County (ODFC) in support of creating sober housing; and 2) in conjunction with the Court Support Services Division of the State of Connecticut Judicial Branch in the creation of transitional housing.

Should the amount of the allocation by the federal government be greater or lesser than the anticipated allocation denoted, these funds will be distributed on a prorated basis as defined above.

<b>Recovery Housing Program</b>	
<b>RHP Award FFY 20</b>	<b>FFY 20 Funding</b>
RHP Award	\$944,000
Minus	
Administrative Authorization (5% of Award)	\$47,200
Equals	
Total RHP Funding for Projects FFY 20	\$896,800

<b>Recovery Housing Program</b>	
<b>RHP Award FFY 21</b>	<b>FFY 21 Funding</b>
RHP Award	\$944,199
Minus	
Administrative Authorization (5% of Award)	\$47,210
Equals	
Total RHP Funding for Projects FFY 21	\$896,989

## **2. Reprogramming of Funds**

During any fiscal year, DOH may recapture funds. Recaptured funds may come from:

- Non-performing grantees; and
- Grantee's underutilized funds.

Any reprogrammed funds obtained during the FY will be reallocated based on demand and/or emergency situations. In the event that additional funds are allocated that affect Connecticut's initial allocation and/or are recaptured from other states and reallocated to Connecticut during the FY, these funds will be distributed in accordance with the Action Plan guidelines in effect as of the date of reallocation.

## **3. Eligible Use of Funds**

The State of Connecticut will utilize RHP funding on RHP-eligible activities (42 U.S.C. 5305(a)). The state will utilize RHP funding for the purpose of providing stable, temporary housing for individuals in recovery from a substance use disorder.

CDBG-eligible activities that meet the RHP intent of providing stable, temporary housing for individuals in recovery from a substance use disorder are limited to:

- Public facilities and improvements;
- Acquisition of real property;
- Lease, rent, and utilities;
- Rehabilitation and reconstruction of single-unit residential buildings;
- Rehabilitation and reconstruction of multi-unit residential buildings;
- Rehabilitation and reconstruction of public housing;
- Disposition of real property;
- Clearance and demolition;
- Relocation; and
- Expansion of existing eligible activities to include new construction of housing.

Any activity not specifically authorized by HUD program regulations will be considered to be ineligible for assistance under the Recovery Housing Program.



Limitations on eligible activities are detailed in Section 6, Program Eligibility and Threshold Requirements, below.

#### **4. The Housing and Community Development Act of 1974 (as amended)**

RHP funds may not be used for activities to aid in the prevention or elimination of slums or blight, or activities addressing urgent needs. All RHP funds must be used for activities that benefit LMI persons. 24CFR 570.208(a)(2) and 570.483(b)(2)(i)(B) expand Limited Clientele criteria to enable assistance for acquisition, rehabilitation, reconstruction, or new construction activities, when at least 51% of beneficiaries are LMI. Any cost or other limitations on beneficiary participation may not be prohibitive for low-income persons. In addition, 24CFR 570.208(a)(2)(i)(A) or 570.483(b)(2)(ii)(A) expands eligible categories of Limited Clientele to include persons who meet the federal poverty limits or persons who are insured by Medicaid.

#### **5. Application Selection Process and Procedures**

DOH will issue a Notice of Funding Availability (NOFA) in order to solicit proposals for funding consistent with the eligible activity requirements of RHP. DOH will provide adequate advance notice of fund availability and reserves the right to cease accepting applications at any time that all available funds have been committed. Based on funding availability and other considerations, DOH may limit the number of applications that can be submitted by an eligible applicant in a funding round. Notification of such limitation will be included in DOH's NOFA should DOH elect to set such a limitation.

#### **6. Program Eligibility and Threshold Requirements:**

DOH has established the following threshold requirements in order for applicants to be eligible to apply for funds:

- Eligible applicants: nonprofit corporations;<sup>[HC5]</sup>
- Eligible activities: must benefit individuals in recovery from a substance use disorder and are limited to:
  - Acquisition of real property;
  - Lease, rent, and utilities;
  - Rehabilitation and reconstruction of multi-unit residential buildings;

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- Disposition of real property;
- Clearance and demolition;
- Relocation; and
- New construction of housing.
- National Objective: Each proposed activity must meet at least one national objective and must be fully supported within the application;
- Statement of Compliance: Applicants must be in compliance with all existing department assistance agreements and cannot be in default under any CHFA or HUD administered program.

## **7. Application Evaluation Process:**

Proposals will be evaluated by a review team on applicant qualifications including but not limited to:

- financial capacity of the applicant to provide and/or coordinate the provision of necessary services;
- organizational capacity of the applicant to provide and/or coordinate the provision of necessary services;
- past positive history of the applicant with DOH.

DOH will conduct due diligence and evaluate all eligible applications using the evaluation criteria described herein. Depending on the nature of the proposed activity, site inspections may be conducted by DOH staff or its agent. An evaluation of the site's feasibility will be completed and considered as part of the final review. Staff/agent review will include but not be limited to the following:

- detailed project description including map showing project location;
- Project participants and partners including names of lead applicant(s), leasing agencies, equity provider, source of permanent financing and owner of assets after project completion, as applicable;
- project budget and requested grant amount;
- consistency with the RHP program national objectives.

All final decisions are left to the discretion of the DOH Commissioner.

## **8. Funding Priorities:**

As mandated by the SUPPORT Act, The State of Connecticut will distribute funds giving priority to entities with the greatest need and ability to deliver effective assistance in a timely manner. RHP dollars will be utilized in the following two ways: 1) in conjunction with the state's two Continuum of Cares, the Connecticut Balance of State Continuum of Care (CT BOS CoC) and Opening Doors Fairfield County (ODFC) in support of creating sober housing; and 2) in conjunction with the Court Support Services Division of the State of Connecticut Judicial Branch in the creation of transitional housing.

## **9. Program Income/Technical Assistance/Matching Requirements**

Grant administration will be capped at 5% of the allocation. The state does not intend to utilize RHP funds to generate program income or to allocate RHP funding for technical assistance. Administration matching funds are not required.

## **10. Monitoring for Recovery Housing Program Funds**

The Department of Housing shall make reviews and audits of any designated public agencies, units of general local government, and subrecipients. In the case of noncompliance, the state shall take action to prevent further efficiencies and mitigate consequences (24 CFR 570.492).

Additionally, under 24 CFR 58.49 (b) – responsible entity for environmental review, the Department of Housing shall be the responsible agency for submitting the Request for Release of funds to HUD for approval.

## **11. Reporting on Recovery Housing Program Funds**

The accomplishments for the State of Connecticut Recovery Housing Program for Federal Fiscal Year 2020 and Federal Fiscal Year 2021 will be provided upon guidance from HUD with 100% expenditure of funds by September 1, 2027.

## **VI ATTACHMENTS TO THE 2019-20 ACTION PLAN**

### **Attachment A – Citizen Participation**

- Attachment A-1 Amended Citizen Participation Process
- Attachment A-2 Outline of Activity for Virtual Public Hearing/Public Comment
- Attachment A-3 Summary of Public Comments Received and DOH Responses

### **Attachment B – Citizen Participation Documents**

- Attachment B-1 Legal Notice(s) for Virtual Public Hearing and Public Comment Period for the State of Connecticut Recovery Housing Program Action Plan for Federal Fiscal Year 2020 and Federal Fiscal Year 2021
- Attachment B-2 Virtual Public Hearing Recording(s)
- Attachment B-3 Written Comments